MOTION GRANTED.

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

MICHAEL DAVID SILLS and MARY)
SILLS,	
)
Plaintiffs,)
) Case No.: 3:23-cv-00478
v.)
) Judge William L. Campbell, Jr.
SOUTHERN BAPTIST CONVENTION, et) Magistrate Judge Jeffery S. Frensley
al.,)
Defendants.)

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF MOTION FOR PROTECTIVE ORDER

Pursuant to Local Rule 6.01, Plaintiffs, by and through their undersigned counsel, respectfully move for a six (6) day extension to submit their reply in support of their motion for a protective order (Dkt. No. 200), from March 4, 2025, to March 10, 2025. For good cause, the Plaintiffs would show the Court the following:

- 1. On January 31, 2025, Plaintiffs filed their Emergency Motion for Protective Order and to Terminate or Otherwise Stay Deposition. Dkt. No. 200 (the "Motion for Protective Order").
- 2. Defendant Jennifer Lyell submitted an opposition to the Motion for Protective Order that same day. Dkt. No. 202.
- 3. On February 3, 2025, the Court quashed the subpoena subject to the Motion for Protective Order pending resolution of the protective order dispute. Dkt. No. 204.
- 4. On February 18, 2025, the Court held a case management conference with the Parties to discuss, among other things, the Motion for Protective Order. Thereafter, the Court ordered Defendant Lyell to respond to the Motion for Protective Order by February 25, 2025, and Plaintiffs to reply by March 4, 2025. Dkt. No. 209.

- 5. Counsel for Plaintiffs is currently traveling and very recently experienced a death in the family. As such, additional time is needed for Plaintiffs to submit their reply to the Motion for Protective Order.
- 6. Plaintiffs have conferred with counsel for Defendant Lyell who advised they do not oppose the requested extension.

For these reasons, Plaintiffs respectfully request a six (6) day extension of time to file their reply to the Motion for Protective order from March 4, 2025 to March 10, 2025.

Respectfully submitted,

By: /s/ *Katherine B. Riley*

Katherine Barrett Riley (TN BPR#021155)
John W. ("Don") Barrett (admitted *pro hac vice*)
Sterling Aldridge (admitted *pro hac vice*)
BARRETT LAW GROUP, P.A.
P.O. Boy 927

P.O. Box 927 404 Court Square North Lexington, MS 39095 Ph: (662) 834-2488

kbriley@barrettlawgroup.com dbarrett@barrettlawgroup.com saldridge@barrettlawgroup.com

/s/ Shannon M. McNulty

Shannon M. McNulty (admitted *pro hac vice*) CLIFFORD LAW OFFICES, P.C. 120 N. LaSalle Street, 36th Floor Chicago, Illinois 60602 (312) 899-9090 (312) 251-1160 Facsimile SMM@cliffordlaw.com

Gary E. Brewer (TN BPR#: 000942) BREWER AND TERRY, P.C. Attorneys at Law 1702 W. Andrew Johnson Hwy. Morristown, TN 37816-2046 (423) 587-2730

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Katherine B. Riley, hereby certify that on March 4, 2025, I served the above and foregoing on all counsel of record via the Court's CM/ECF filing system.

/s/ *Katherine B. Riley*Katherine B. Riley